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17 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
18 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
19 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
20 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
21 *Blythe Solar Power Project Unit 3, LLC and*
22 *Blythe Solar Power Project Unit 4, LLC*

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 MMR GROUP, INC.,
27 MMR POWER SOLUTIONS, LLC and
28 SOUTHWESTERN POWER GROUP II, LLC,
Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,
PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR
II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC
AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**EIGHTH STIPULATION TO
EXTEND DEFENDANTS'
TIME TO RESPOND TO
AMENDED COMPLAINT
AND [PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

1 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
2 SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
3 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
4 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
5 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
6 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
7 POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request
8 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
9 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
10 by two weeks from January 24, 2012 to February 7, 2012.
11

12 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
13 extension of time for the STAD Defendants to respond to the Amended Complaint because the
14 parties were in advanced stages of settlement discussions. On November 22nd, December 1st,
15 December 27th, and January 10th, the parties requested, and this Court later granted, extensions of
16 two weeks due to continued progress in settlement negotiations. The parties continue to be
17 hopeful that they will execute a settlement agreement forthwith. Due to the continued progress in
18 reaching a settlement, the parties request a two-week extension of the time for the STAD
19 Defendants to respond to the Amended Complaint. The parties' request will have a *de minimis*, if
20 any, impact on the schedule. In the interests of judicial economy, the parties therefore request that
21 the Court extend the STAD Defendants' time to respond to the Amended Complaint by two
22 weeks from January 24, 2012 to February 7, 2012.
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1 Dated: January 20, 2012

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Rachel Penski Fissell

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18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and Blythe Solar*
21 *Power Project Unit 4, LLC*

22 Dated: January 20, 2012

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Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: _____

UNITED STATES DISTRICT JUDGE